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October 11, 2024

**BY ECF**

U.S. District Court – E.D.N.Y.  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Attn: Honorable Magistrate Judge Cheryl L. Pollak

**Re: *Ugwudiobi et al v. International Trendz, LLC d/b/a Presidential Security Co. et ano (22CV4930) (RER) (CLP) and Odom et al v. International Trendz, LLC et ano (23CV828) (RER) (CLP)***

Dear Judge Pollak:

Please be advised that I am the attorney for the *Ugwudiobi* Plaintiffs in the above referenced consolidated proceeding. I write with the knowledge and consent of the *Odom* Plaintiffs, to request a 21 day extension of time for Plaintiffs to serve and file revised, proposed *Notice* and *Consent* forms in connection with Plaintiffs' successful motion for conditional certification under the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §§ 201 *et seq.* See Docket #66.

We ask that the deadline for Plaintiffs to serve and file revised, proposed FLSA Notice and Consent forms be extended through November 1, 2024. This request is necessitated by the fact that *Odom* Plaintiffs' counsel Justin Clark, Esq. recently departed from the firm of Levine & Blitt, PLLC. He has been replaced by Russell Moriarty, Esq. of the same firm, but we have been unable to meaningfully communicate and consult with him due to his presence in Florida. I spoke with his office and was told that Mr. Moriarty is stuck in Florida due to Hurricane Milton with limited to no cellular telephone service and limited to no available flights out.

This is Plaintiffs' first request for an extension of this deadline. If granted, we also ask that Defendant's time to produce the disclosures directed in the Court's September 27, 2024

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Memorandum & Order be similarly extended by 21 days, to November 22, 2024. No other scheduled dates will be affected if the instant application is granted. Prior to making this application, I sought the consent of Defendant through its counsel. I received no response.

Thank You for Your time and consideration. Kindly direct any questions to the undersigned.

Respectfully yours,

/s/

David C. Wims, Esq. (DW-6964)

cc: Honorable Ramon E. Reyes (By ECF)  
Ian Smith, Esq. (By ECF)  
Erik Bashian, Esq. (By ECF)  
Russell Moriarty, Esq. (By Email and ECF)